IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

AMERICAN TOWERS LLC AND AMERICAN TOWER MANAGEMENT, LLC,	§ § § §	
Plaintiffs,	§ §	**CIVIL ACTION NO. 2:16-cv-00424**
v.	§ §	
MARY HELEN LOPEZ,	§ §	
Defendant.	§	

DEFENDANT'S FIRST DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendant Mary Helen Lopez makes its First Disclosures as follows:

I.
Individuals With Discoverable Information

The following individuals are likely to have discoverable information related to Mary Helen Lopez's defense in this case:

1. Mary Helen Lopez

Defendant in this lawsuit.

c/o Joe A. Flores
500 N. Water Street, Suite 515
Corpus Christi, TX 78401
Telephone: (361) 887-8670
Facsimile: (361) 887-8651
attorneyjoeflores@me.com

2. The Defendant cross-notices each and every witness that the Plaintiffs shall disclose.

3. Bobby Lerma
2209 North Padre Island Dr., Ste. B
Corpus Christi, TX 78408

4. Robert Lerma
2209 North Padre Island Dr., Ste. B
Corpus Christi, TX 78408

5. Pat Delaney
2209 North Padre Island Dr., Ste. B
Corpus Christi, TX 78408

6. Easton Santos
2209 North Padre Island Dr., Ste. B
Corpus Christi, TX 78408

Defendant reserves the right to supplement should additional information become available through discovery.

II.
Relevant Documents and Tangible Things

The Defendant cross-notices any and all documents and tangible things produced by the Plaintiff. The Defendant will supplement all documents that are relevant and tangible timely.

III.
Information Related to Calculation of Damages

The Defendant, Mary Helen Lopez, contends that discovery is in its infancy. However, the Defendant relies and incorporates by reference the pleadings and counterclaims, including but not limited to, breach of contract, constructive eviction and other associated causes of action that may be amended through the complaint. The Defendant has lost an excess of $200,000 in past, present and future damages excluding attorney's fees and costs.

IV.
Insurance

The Defendant contends that the existence of an insurance policy is not relevant nor is it discoverable in this matter.

Respectfully submitted,

/s/Joe A. Flores Attorney

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I, Joe A. Flores, Attorney for Mary Helen Lopez, hereby certify that I have served a copy of said Defendant's First Disclosures to Mr. David Swanson and Mr. Nicholas Demeropolis via facsimile on this 4th day of May, 2017.

/s/ Joe A. Flores
Joe A. Flores